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5 Attorneys for Defendant FreedomRoads, LLC  
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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 LOUANN BARNETT,

12 Plaintiff,

13 vs.

14 FREEDOMROADS, LLC, successor in  
15 interest to WHEELER RV LAS VEGAS,  
16 LLC, doing business as LAS VEGAS RV;  
DOES 1-10,

17 Defendants.

Case No. 2:11-CV-00175-GMN-RJJ

**MOTION TO REQUEST TELEPHONIC  
APPEARANCE AT EARLY NEUTRAL  
EVALUATION SESSION**

18 Defendant FreedomRoads, LLC (“Defendant”), by and through its counsel of record, hereby  
19 files this Motion requesting permission to permit Defendant’s insurance representative to be  
20 available telephonically for participation in the Early Neutral Evaluation (“ENE”) Session, which is  
21 currently scheduled for November 10, 2011.

22 The Order Scheduling ENE Session (**Docket #14**) requires the presence of a representative  
23 for any insurance policies implicated by the proceedings. Defendant files this Motion requesting  
24 that its insurance representative be permitted to attend the ENE telephonically because the  
25 representative resides in Illinois and, in light of the self-insured retention in this matter, indemnity  
26 may not be triggered. Therefore, Defendant believes that it would be more efficient and economical  
27 to permit the insurance representative to appear telephonically.

28 . . .

1 In consideration of the above, Defendant respectfully requests that the Court grant its request  
2 to permit Defendant's insurance representatives to appear telephonically for the ENE session  
3 scheduled for November 10, 2011.

4  
5 Dated: October 31, 2011

6 Respectfully submitted,

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9 BRUCE C. YOUNG, ESQ.  
10 HILARY B. MUCKLEROY, ESQ.  
11 LITTLER MENDELSON

12 Attorneys for Defendant FreedomRoads, LLC

13 IT IS SO ORDERED this 7th day  
14 of November, 2011.

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17 Peggy A. Leen  
18 United States Magistrate Judge  
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**PROOF OF SERVICE**

I am a resident of the State of Nevada, over the age of eighteen years, and not a party to the within action. My business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, Nevada, 89169. On October 31, 2011, I served the within document(s):

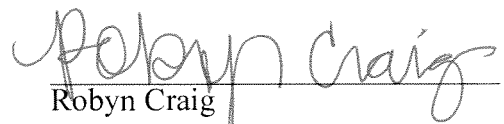
**MOTION TO REQUEST TELEPHONIC APPEARANCE  
AT EARLY NEUTRAL EVALUATION SESSION**

☒ By CM/ECF Filing – with the United States District Court of Nevada, a copy of the Court's notification of e-filing is attached to the hard copy for either faxing, mailing, overnight delivery, and/or hand-delivery.

Robert J. Kossack, Esq.  
Kossack Law Offices  
4535 W. Sahara Avenue, Suite 101  
Las Vegas, NV 89102

I am readily familiar with the firm's practice of collection and processing correspondence for mailing and for shipping via overnight delivery service. Under that practice it would be deposited with the U.S. Postal Service or if an overnight delivery service shipment, deposited in an overnight delivery service pick-up box or office on the same day with postage or fees thereon fully prepaid in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 31, 2011, at Las Vegas, Nevada.

  
Robyn Craig

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